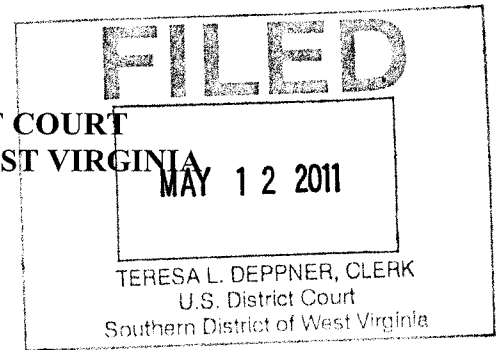


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT HUNTINGTON



TIFFANY A. HALLEY,

Plaintiff

v.

CIVIL ACTION NO. 3:11-D332

ST. MARY'S MEDICAL CENTER, INC.

Defendant.

COMPLAINT

1. Jurisdiction is founded on diversity of citizenship and amount.
 - a. Plaintiff, Tiffany A. Halley, is a resident of the Commonwealth of Kentucky;
 - b. Defendant, St. Mary's Medical Center, Inc. (hereinafter called SMMC), is a West Virginia Corporation with its principal place of business located in Huntington, Cabell County, West Virginia.
 - c. The matter in controversy exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C. 1332.
2. This medical professional liability action arises out of the medical care and treatment received by the Plaintiff, Tiffany A. Halley, at SMMC on or about April 13, 2009, and thereafter.
3. Plaintiff fully complied with the pre-suit notification requirements found at W.Va.Code § 55-7B-6 and the Defendant declined pre-suit mediation.
4. On or about April 13, 2009, Plaintiff became a patient at SMMC.

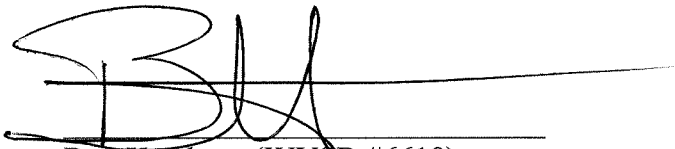
5. SMMC negligently rendered health care services to the Plaintiff proximately causing significant personal injuries and damages.

6. Defendant, SMMC, acting by and through its agents, servants or employees, deviated from the standard of care by failing to exercise that degree of care, skill and learning required or expected of reasonable, prudent health care providers in the profession or class to which the health care provider belongs acting in the same or similar circumstances during the care and treatment of Plaintiff, Tiffany A. Halley, on or about April 13, 2009, and thereafter.

7. As a proximate result of the Defendant, SMMC's, negligent conduct and deviations of the standard of care, the Plaintiff, Tiffany A. Halley, suffered significant personal injuries and damages and is entitled to an award of general damages and/or special damages as may be afforded under West Virginia law.

WHEREFORE, Plaintiff, Tiffany A. Halley, demands judgment against the Defendant, SMMC, in such sums as will fully and fairly compensate the Plaintiff for her injuries and damages sustained together with pre-judgment interest and post judgment interest and/or all other damages afforded by West Virginia law.

A trial by jury is demanded.

A handwritten signature in black ink, appearing to read 'Bert Ketchum', is written over a horizontal line.

Bert Ketchum (WVSB #6618)
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